

EXHIBIT D

TO POMERANTZ DECLARATION

1
2
3 UNITED STATES DISTRICT COURT
4 FOR THE NORTHERN DISTRICT OF CALIFORNIA
5 SAN FRANCISCO DIVISION
6 Case No. 3:21-md-02981-JD

7 -----x

8 IN RE GOOGLE PLAY STORE
9 ANTITRUST LITIGATION

10 THIS DOCUMENT RELATES TO:

11 Epic Games Inc. v. Google LLC, et al.,

12 Case No: 3:20-cv-05671-JD

13 In re Google Play Consumer

14 Antitrust Litigation,

15 Case No: 3:20-cv-05761-JD

16 In re Google Play Developer

17 Litigation,

18 Case No: 3:20-cv-05792-JD

19 State of Utah, et al.,

20 v. Google LLC, et al.,

21 Case No: 3:21-cv-05227-JD

22 Match Group, LLC, et al.,

23 v. Google LLC, et al.,

24 Case No. 3:22-cv-02746-JD

25 -----x

September 22, 2022

9:07 a.m.

26 ** H I G H L Y C O N F I D E N T I A L **

27 Videotaped Deposition of ARMIN ZERZA,
28 taken by Plaintiffs, pursuant to Notice,
29 held via Zoom videoconference, before Todd
30 DeSimone, a Registered Professional
31 Reporter and Notary Public.

1 ZERZA - HIGHLY CONFIDENTIAL

2 when Activision sells a game app through
3 the Apple App Store?

4 A. 30 percent.

5 Q. What is Apple's platform fee
6 when Activision sells an in-app purchase to
7 a user through an iPhone app?

8 A. 30 percent.

9 Q. So you have testified
10 previously about a deal or a series of
11 deals that Activision signed with Google in
12 the beginning of 2020. Do you recall that?

13 A. I do, yes.

14 Q. Does Activision's deal with
15 Google prevent it from creating its own app
16 store for Android users?

17 A. It does not.

18 Q. Does Activision have any
19 agreement, whether written or otherwise,
20 with Google that it will not launch a
21 competing Android app store?

22 A. Not at all.

23 Q. Are you familiar with something
24 called the Galaxy Store from Samsung?

25 A. You mean the Samsung Galaxy